

1 THE HONORABLE JAMAL N. WHITEHEAD
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 PLAINTIFF PACITO; PLAINTIFF ESTHER;
10 PLAINTIFF JOSEPHINE; PLAINTIFF SARA;
11 PLAINTIFF ALYAS; PLAINTIFF MARCOS;
12 PLAINTIFF AHMED; PLAINTIFF RACHEL;
13 PLAINTIFF ALI; HIAS, INC.; CHURCH
WORLD SERVICE, INC.; and LUTHERAN
COMMUNITY SERVICES NORTHWEST,

Plaintiffs,

14 v.
15
16 DONALD J. TRUMP, in his official capacity as
17 President of the United States; MARCO RUBIO,
in his official capacity as Secretary of State;
KRISTI NOEM, in her official capacity as
18 Secretary of Homeland Security; ROBERT F.
KENNEDY, JR., in his official capacity as
19 Secretary of Health and Human Services,

Defendants.

Case No. 2:25-cv-255-JNW

**DECLARATION OF MEGAN M.
HAUPTMAN IN SUPPORT OF
PLAINTIFFS' MOTION TO
ENFORCE THE FIRST
PRELIMINARY INJUNCTION
AND EMERGENCY MOTION FOR
SHOW CAUSE HEARING**

21 I, Megan M. Hauptman, hereby declare as follows:
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23 1. I am over the age of eighteen and competent to make this declaration. I am an
attorney with the International Refugee Assistance Project (IRAP) and counsel for Plaintiffs in the
24 above-captioned matter. I make this declaration based on personal knowledge about which I am
25 competent to testify.
26

DECL. OF MEGAN M. HAUPTMAN
(No. 2:25-cv-255-JNW)

Perkins Coie LLP
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Seattle, Washington 98101-3099
Phone: +1.206.359.8000
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1 2. On March 27, 2025, counsel for Plaintiffs emailed counsel for Defendants
2 requesting an update by April 1 as to steps taken to implement the first preliminary injunction in
3 this matter, including updates as to case progress for each of the individual Plaintiffs. As of the
4 execution of this declaration, Defendants' counsel has not provided a substantive response.

5 3. I further submit this declaration to provide the Court true and correct copies of
6 certain documents submitted in support of Plaintiffs' motion to enforce the first preliminary
7 injunction:

8 **Exhibit 1** is a true and correct copy of the document titled "Refugees: 2023." The report
9 was downloaded at my direction on April 3, 2025, and is available on the Office of Homeland
10 Security Statistics website at https://ohss.dhs.gov/sites/default/files/2024-11/2024_1108_ohss_refugee_annual_flow_report_2023.pdf.

12 **Exhibit 2** is a true and correct copy of the declaration of Katherine Rehberg, dated April 3,
13 2025.

14 **Exhibit 3** is a true and correct screen capture of the article titled "Mission South Africa:
15 How Trump is Offering White Afrikaners Refugee Status." This article was captured at my
16 direction on April 3, 2025, and is available on the *New York Times* website at <https://www.nytimes.com/2025/03/30/us/politics/trump-south-africa-white-africans-refugee.html>.

18 **Exhibit 4** is a true and correct copy of the declaration of Plaintiff Ahmed, dated April 2,
19 2025, with attachments.

20 **Exhibit 5** is a true and correct copy of the declaration of Plaintiff Sara, dated April 1, 2025.

21 **Exhibit 6** is a true and correct copy of the declaration of Plaintiff Alyas, dated April 3,
22 2025.

23 **Exhibit 7** is a true and correct copy of the declaration of Plaintiff Pacito, dated April 3,
24 2025.

25 **Exhibit 8** is a true and correct copy of the declaration of Plaintiff Marcos, dated April 1,
26 2025.

Exhibit 9 is a true and correct copy of an email received by attorney Maura Heron from the Resettlement Support Center (RSC) for Latin America, dated March 24, 2025, titled “Automatic reply: Question about CAM refugees in Honduras.” This email was received by IRAP from attorney Heron.

Exhibit 10 is a true and correct copy of an email received by an IRAP staff member from the RSC for the Middle East and North Africa, dated March 27, 2025, titled “Automatic Reply: P2 DAP travel ready cases.”

Exhibit 11 is a true and correct copy of an email received by attorney Angie Plummer from the U.S. Embassy Paris on behalf of a follow-to-join (FTJ) petitioner with an FTJ petition approved by U.S. Citizenship and Immigration Services, subsequent to the FTJ beneficiary's interview, dated April 3, 2025, titled "Re: From the U.S. Embassy Paris -- [REDACTED] - V93 – Additional information needed." This email was received by IRAP from attorney Plummer.

* * *

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

EXECUTED this 3rd day of April, 2025, at Arlington, Virginia.

s/ Megan M. Hauptman
Megan M. Hauptman